

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Sheri Lou Cumberledge

Debtor

Ronda J. Winneccour, Chapter 13 Trustee

Movant

vs.

AmeriHome Mortgage Company, LLC

Respondent

NO. 17-24288-JAD

CHAPTER 13

Related to Doc. 76

**MIDFIRST BANK'S RESPONSE TO TRUSTEE'S MOTION TO PRECLUDE
POSTPETITION MORTGAGE FEES, EXPENSES AND CHARGES**

Respondent, MidFirst Bank, successor to AmeriHome Mortgage Company, LLC, by and through its counsel, KML Law Group, P.C., files its within Response to Trustee's Motion to Preclude Postpetition Mortgage Fees, Expenses and Charges, and in support thereof respectfully represents as follows:

1. Claim No. 16-1 was transferred to MidFirst Bank pursuant to a Transfer of Claim filed October 31, 2018 (doc. 65).
2. MidFirst Bank responds that the Notice of Postpetition Mortgage Fees, Expenses and Charges filed July 19, 2019 shall be withdrawn and that the fees requested therein shall be waived.
3. MidFirst Bank further responds that it shall file an affidavit and loan history to confirm the removal of these charges from Debtor's account, and that it will not charge Debtor's account for responding to the Trustee's motion.

WHEREFORE, Respondent prays that the Trustee's Motion to Preclude Postpetition Mortgage Fees, Expenses and Charges be denied consistent with its responses above.

Respectfully submitted,

Date: July 9, 2019

/s/ James C. Warmbrodt, Esquire

James C. Warmbrodt, Esquire
Attorney I.D. No. 42524
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
412-430-3594
jwarmbrodt@kmllawgroup.com